

DICKSTEIN SHAPIRO MORIN
& OSHINSKY LLP
David L. Elkind (DE-5559)
Stacey A. Saiontz (SS-1705)
1177 Avenue of the Americas
New York, New York 10036-2714
Telephone: (212) 835-1400
Facsimile: (212) 997-9880
Attorneys for Defendant KeySpan Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

AMERICAN STEAMSHIP OWNERS MUTUAL
PROTECTION AND INDEMNITY
ASSOCIATION, INC.,

Plaintiff,

-against-

ALCOA STEAMSHIP CO., INC., et al.,

Defendants.

ECF CASE

Case No. 04 CV 4309 (LAK)

Defendant KeySpan Corporation's Joinder
In The Memorandum Filed By Certain
Defendants In Opposition to the Maritime
Claimants' Motion To Intervene

**DEFENDANT KEYSPAN CORPORATION'S JOINDER IN THE
MEMORANDUM FILED BY CERTAIN DEFENDANTS IN OPPOSITION
TO THE MARITIME CLAIMANTS' MOTION TO INTERVENE**

KeySpan Corporation ("KeySpan") respectfully joins in the memorandum filed by certain defendants (Keystone Shipping Company, et al.) in opposition to the maritime claimants motion to intervene filed in the above- captioned case. The arguments and reasoning underlying *The Memorandum In Opposition To The Maritime Claimants' Motion to Intervene* filed with this Court on October 12, 2004, are equally applicable to KeySpan. KeySpan has reviewed *The Memorandum In Opposition To The Maritime Claimants' Motion to Intervene* and KeySpan adopts and incorporates by reference all of the arguments and reasoning. Accordingly, KeySpan

joins *The Memorandum In Opposition To The Maritime Claimants' Motion to Intervene.*

Dated: New York, New York
October 12, 2004

DICKSTEIN SHAPIRO MORIN &
OSHINSKY LLP

By: _____ S/
Stacey A. Saiontz (SS-1705)
David L. Elkind (DE-5559)